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19 UNITED STATES DISTRICT COURT  
20 DISTRICT OF NEVADA  
21 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
21 Vera, Luis Javier Vazquez, and Kyle  
22 Kingsbury on behalf of themselves and all  
22 others similarly situated,

23 Case No.: 2:15-cv-01045-RFB-(PAL)

24 Plaintiffs,

25 v.

26 Zuffa, LLC, d/b/a Ultimate Fighting  
26 Championship and UFC,

27 Defendant.

28 **ZUFFA'S UPDATE TO JOINT STATUS  
REPORT (ECF NO. 244)**

1           In the Joint Status Report, Zuffa reported that it had recently discovered an Early Case  
 2 Assessment archive (“ECA”) that Zuffa’s former e-discovery vendor responsible for the 2011  
 3 productions to the FTC had maintained, and indicated that it would provide additional  
 4 information about these documents when it became available. ECF No. 244. This submission  
 5 provides this information.

6           The ECA contains a total of approximately 1.8 million documents, including  
 7 approximately 97,000 of the documents that were ultimately produced to the FTC and which have  
 8 been re-produced to Plaintiffs. Accounting for those documents in the ECA that have already  
 9 been re-produced to Plaintiffs, there are 1,711,927 documents remaining in the archive that are  
 10 either undated or fall within the relevant time period. The chart below shows the breakdown of  
 11 documents from the relevant time period by for each custodian or employee in the ECA database.  
 12 Among the 22 Zuffa custodians in this case, the ECA contains a total of 807,836 documents.

13           **Documents from the 22 Ordered Custodians**

<b>Custodian</b>	<b>Documents</b>	<b>Date Range</b>
Michael Mersch	171,456	2006-2012 (Note: Mr. Mersch was Asst. General Counsel from 2006-2012.)
Kirk Hendrick	114,118	2005-2011 (Note: Mr. Hendrick was General Counsel from 2005-2007.)
Tracy Long (Tracy Hyman)	103,135	2005-2011 (Note: Ms. Long was a paralegal in Zuffa’s legal department throughout this period.)
Lorenzo Fertitta	78,657	2005-2012
Craig Borsari	71,265	2005-2011
John Mulkey	56,494	2005-2012
Peter Dropick	50,143	2005-2012
Bryan Johnston	45,432	2005-2011
Joe Silva	32,946	2005, 2007-2011
Lawrence Epstein	30,073	2007-2012 (Note: Mr. Epstein was General Counsel from 2007-2012.)
Michael Mossholder	24,755	2007-2011
Dana White	12,118	2005-2011
Reed Harris	9,150	2005-2011
Sean Shelby	8,094	2005-2011
<b>TOTAL: 807,836</b>		

**Documents from Other Zuffa or Strikeforce Employees**  
**(Strikeforce employees are noted in parentheses;**  
**the remaining individuals were Zuffa employees)**

Custodian	Documents	Date Range
Andrew Ebel (Strikeforce)	252,082	2005-2011
Mike Aframowitz (Strikeforce)	117,971	2006, 2008-2011
Edward Muncey	91,277	2005-2011
Doug Hartling	81,153	2005-2011
Jennifer Cooke (Strikeforce)	77,385	2005-2011
Chad Hurley	72,631	2005-2011
Richard Chou (Strikeforce)	46,350	2009-2011
Tim Bellamy	31,417	2008-2011
Beth Turnbull	27,103	2005-2011
Shannon Knapp (Strikeforce)	26,859	2009-2011
Scott Coker (Strikeforce)	20,860	2006-2011
Don Gold	20,644	2007-2011
Elizabeth Loucheur	17,351	2006-2011
Carie A'Ana (Strikeforce)	16,150	2009-2011
Strikeforce	2,582	2005-2011
Bob Cook (Strikeforce)	1,213	2009-2011
Kenn Ellner (Strikeforce)	353	2011
Graphics Collateral	253	2011
Reid Sterrett	210	2006, 2009-2011
Tara Connell	142	2010-2011
Strikeforce Management	56	2008-2011
Strikeforce Shared	31	[Undated]
Brandon Clark	18	2009-2011
<b>TOTAL: 904,091</b>		

Also attached to this update is a declaration from Zuffa's e-discovery consultant, Ms. Moure, that responds to certain points made in Mr. Kellner's declaration. Because Zuffa did not receive Mr. Kellner's draft declaration until the evening before the Joint Status Report was due,

1 Ms. Moure did not have an opportunity to draft a response for submission with the Joint Status  
2 Report.

3 Dated: May 13, 2016

4 BOIES, SCHILLER & FLEXNER LLP

5  
6 By: /s/ John F. Cove, Jr.  
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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that service of the foregoing **Zuffa's Update to Joint Status Report** was served on May 13, 2016 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Michael Kim

An Employee of Boies, Schiller & Flexner